

OFFICE OF THE DIRECTOR
DEPARTMENT OF MOTOR VEHICLES
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June 30, 2009

Steven Eldred, Acting Director
Department of Child Support Services
Orange County
1055 North Main Street
Santa Ana, CA 92701

File: C-47-9097

Dear Mr. Eldred,

The California Department of Motor Vehicles' (DMV) Audits Office audit of the Department of Child Support Services (DCSS Orange) Government Requester Accounts is complete. The audit was based on the requirements stipulated in the *Memorandum of Understanding (MOU) - DMV via Health and Welfare Data Center Communication Line via the Medi-Cal Eligibility Data Systems* access (HWDC/MEDS), the *California DMV Electronic Access Requirements*, and applicable statutes and regulations stated in the California Vehicle Code and the California Code of Regulations. We conducted an onsite audit at the North Main Street location on May 12, 2009.

This Audit covered the period March 1, 2008 through March 30, 2009. The objectives of the audit were to determine if DCSS Orange:

- Internal controls are adequate to safeguard information obtained from DMV;
- Complies with the provisions of the MOU HWDC/MEDS and applicable DMV agreements;
- Adheres to applicable rules and regulations governing the processing, storage and transmission of DMV information.

In addition as part of this review an on-site visit was made on June 11, 2009 to the Orange County Data Center (OCDC). The visit to OCDC was completed in conjunction with the DCSS Orange to follow the audit trail of information requests. As a result of the audit, there were no exceptions noted. Therefore, no response to this report is necessary.

DMV Information Services Branch (ISB), who has jurisdiction over government requester accounts, and the California State Department of Child Support Services will receive copies of the attached report.

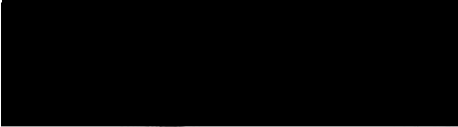
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We would like to thank DCSS Orange and OCDC staff for their cooperation and the courtesy extended to our auditors. If you have any questions about this audit, please contact Laura Lundgren at (916) 657- 6055.

Sincerely,



GRACE M. RULE-ALI, Manager
Information Systems-Requester Audit Section
Audits Office

Attachment

cc: Jill Howery, Manager, DCSS Orange
Tony Lucich, PMP, OCDC
Joan Obert, Director, State DCSS
Tam Le, DMV Manager, ISB Policy & Information Privacy Section
Paulette Johnson, DMV Chief, Information Security and Privacy Officer

**CALIFORNIA DEPARTMENT OF MOTOR VEHICLES
EXECUTIVE AUDITS
DEPARTMENT OF CHILD SUPPORT SERVICES
ORANGE COUNTY
AUDIT REPORT
C-47-9095**

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EXECUTIVE SUMMARY

The California Department of Motor Vehicles (DMV) Information Services Branch (ISB) operates an information requester program that allows external entities to access DMV records pursuant to applicable statutes of the California Vehicle Code (CVC) and California Code of Regulations Title 13, Article 5 except as prohibited by CVC Section 1808.21. As an authorized DMV Government Requester Account holder the Department of Child Support Services Orange (DCSS Orange), has access to basic record and address information on California Driver License, Vehicle Registration, Occupational License, and Financial Responsibility. In accordance with its DMV Government Requester Account agreement, DCSS Orange is allowed to make California DMV inquiries for its business needs.

The CVC mandates that DMV protect the privacy rights of the public by releasing only certain information authorized by statutes. Statutes and regulations allow for businesses and individuals to access DMV records containing both confidential and non-confidential information, contingent upon approval of an application and compliance with the program requirements. DMV is dedicated in its mission of securing personal information for consumer protection. To meet our obligation of protecting the public and DMV information, we reviewed DCSS Orange's compliance with the DMV Government Requester Account stipulations, and applicable California laws and regulations.

Our evaluation found that the current security controls in effect at DCSS Orange as of June 11, 2009, are sufficient to meet the security objectives of this audit.

BACKGROUND

In June 2002 statutory changes reshaped the California child support program. The local county child support agencies (LCSA's) were no longer considered law enforcement agencies and had to change the access methods to obtain data from DMV.

Formerly, LCSA requested access to DMV's databases via CLETS. DMV granted approval to allow DCSS Orange electronic access via the Department of Technology Services (DTS), formerly the Teale Data Center. DMV's approval was granted with the condition that the appropriate access, logging and auditing controls are in place. The requester code has the following access to DMV information:

- Driver License – to help determine physical descriptions, addresses and age of subjects suspected of welfare fraud.
- Vehicle Registration – to help verify vehicles owned, and to verify place of residence of those suspected of welfare fraud.

- Financial Responsibility – to help determine how much money a suspect is spending per month to live.
- Occupational License – to help verify whether or not a suspected client is employed and where he/she may be working.

DCSS Orange uses their requester codes to access California Driver License information to locate absent parents in order to secure Child Support for the child. DCSS Orange makes their requests online.

OBJECTIVES, SCOPE, AND METHODOLOGY

DMV is responsible for administering statewide programs that use and rely on information assets whether they are electronically stored or hard copy documents. DMV conducts audits and evaluations of entities accessing the information of the Department, for compliance purposes. The audit was performed in accordance with *Government Auditing Standards*, Generally Accepted Auditing Standards, and the California Department of Motor Vehicles' Government Requester Account Requirements.

The audit objectives were to verify compliance with the requirements of the requester accounts held by DCSS, as well as applicable statutes and regulations stated in the CVC and the California Code of Regulations; and review the security procedures that DCSS Orange has in place to ensure the protection of DMV information. This included evaluation of DCSS Orange administrative procedures, and applicable monitoring programs.

Our evaluation methodology included such tests as considered necessary to meet our objectives. Interviews were conducted with DCSS management, physical observation of the DCSS Orange facility to determine the levels of security, and confidentiality over DMV information.

We conducted the audit fieldwork at the DCSS office in Orange County, California May 11, 2009. Our audit included an examination of the administrative security procedures, and the monitoring of programs that are in place to protect DMV information. On June 10, 2009, a visit was made to the Orange County Data Center follow the audit trail of information requests.

CONCLUSION

DCSS' Orange operates a system and program that permits its authorized end users access to DMV information, and provides assurance that access to the information is appropriately controlled and monitored in accordance with the requirements of its Government Requester

Accounts. Accordingly, the mechanisms and controls in place to protect information received from DMV taken as a whole are sufficient and functioning properly to fulfill the program objectives. Because of inherent limitations in control systems, errors or irregularities may occur and not be detected. Consequently, projection of any evaluation of systems to future periods is subject to risk since procedures may become inadequate because of changes, or the degree of compliance with procedures may deteriorate.



GRACE M. RULE-ALI, MANAGER

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May 28, 2009

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